

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>MLCJR LLC, <i>et al.</i>,</b>     <b>Debtors.<sup>1</sup></b>	§ § § § § §	<b>Case No. 23-90324 (CML)</b>  <b>(Chapter 7)</b>  <b>(Jointly Administered)</b>
--	----------------------------	---

**WITNESS AND EXHIBIT LIST OF  
NATURAL RESOURCES WORLDWIDE LLC FOR  
THE HEARING ON THE EMERGENCY MOTION FOR AUTHORITY TO  
(A) RELINQUISH CERTAIN FEDERAL LEASES; (B) ABANDON THE REMAINING  
TITLE TO CERTAIN FEDERAL LEASES; AND (C) FOR RELATED RELIEF**

Natural Resources Worldwide LLC (“NRW”) hereby submits its Witness and Exhibit List in connection with the hearing scheduled for Tuesday, January 28, 2025 at 1:00 p.m. in Courtroom 401 (the “Hearing”), on the *Emergency Motion For Authority To (A) Relinquish Certain Federal Leases; (B) Abandon The Remaining Title To Certain Federal Leases; And (C) For Related Relief* [Dkt. 2341]:

**WITNESS LIST**

NRW may call the following witnesses at the Hearing:

1. Vincent DeVito, Manager and CEO, NRW;
2. Steven Dudgeon, Severance Tax/Royalty, Ryan, LLC;
3. Any witnesses listed or called by any other party; and
4. Any witnesses necessary for rebuttal, impeachment, or authentication purposes.

---

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identifications number, are: MLCJR, LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL oil & Gas, LLC (9562); and M21K, LLC (3978).

**EXHIBIT LIST**

NRW may use the following exhibits at the Hearing:

<b><u>EXHIBIT</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>MARK</u></b>	<b><u>OFFER</u></b>	<b><u>OBJECT</u></b>	<b><u>ADMIT</u></b>	<b><u>W/D</u></b>	<b><u>DISPOSITION AFTER HEARING</u></b>
<b>1</b>	<p>[In Globo] Assignment of Record Title Interest Forms (BOEM-0150), Assignment of Operating Rights Interest Forms (BOEM-0151), and/or Designation of Operator Forms (BOEM-1123) submitted to the Bureau of Ocean Energy Management for Federal Leases</p> <p>[1] OCS-00016, [2] OCS-00026, [3] OCS-00126, [4] OCS-00127, [5] OCS-00128, [6] OCS-00129, [7] OCS-00130, [8] OCS-00131, [9] OCS-00132, [10] OCS-00133, [11] OCS-00134, [12] OCS-00174, [13] OCS-00175, [14] OCS-00176, [15] OCS-00177, [16] OCS-00179, [17] OCS-00180, [18] OCS-00181, [19] OCS-00182, [20] OCS-00310, [21] OCS-00367, [22] OCS-00819, [23] OCS-00821, [24] OCS-00827, [25] OCS-00838, [26] OCS-00839, [27] OCS-G-01019, [28] OCS-G-01228, [29] OCS-G-01230, [30] OCS-G-01447, [31] OCS-G-01497, [32] OCS-G-01498, [33] OCS-G-01673, [34] OCS-G-02213, [35] OCS-G-02323, [36] OCS-G-04109, [37] OCS-G-04231, [38] OCS-G-04437, OCS-G-08684, [40] OCS-G-12951, [41] OCS-G-24954, [42] OCS-G 02324</p>						

2	<p>[In Globo] Acknowledgment of Receipt E-mails from The Adjudication Team for the Assignment of Record Title Interest Forms (BOEM-0150), Assignment of Operating Rights Interest Forms (BOEM-0151), and/or Designation of Operator Forms (BOEM-1123) submitted to the Bureau of Ocean Energy Management for Federal Leases</p> <p>[1] OCS-00016, [2] OCS-00026, [3] OCS-00126, [4] OCS-00127, [5] OCS-00128, [6] OCS-00129, [7] OCS-00130, [8] OCS-00131, [9] OCS-00132, [10] OCS-00133, [11] OCS-00134, [12] OCS-00174, [13] OCS-00175, [14] OCS-00176, [15] OCS-00177, [16] OCS-00179, [17] OCS-00180, [18] OCS-00181, [19] OCS-00182, [20] OCS-00310, [21] OCS-00367, [22] OCS-00819, [23] OCS-00821, [24] OCS-00827, [25] OCS-00838, [26] OCS-00839, [27] OCS-G-01019, [28] OCS-G-01228, [29] OCS-G-01230, [30] OCS-G-01447, [31] OCS-G-01497, [32] OCS-G-01498, [33] OCS-G-01673, [34] OCS-G-02213, [35] OCS-G-02323, [36] OCS-G-04109, [37] OCS-G-04231, [38] OCS-G-04437, OCS-G-08684, [40] OCS-G-12951, [41] OCS-G-24954, [42] OCS-G 02324</p>						
3	<p>[In Globo] OCS Mineral Lesse's or Operator's Bond Form (BOEM-2028), OCS Mineral Lesse's or Operator's Supplemental Bond Forms (BOEM-2028A), and OCS Pipeline Right-of-Way Grant Bond Form (BOEM-2030) with Bond Numbers:</p> <p>[1] N-8100059 [2] N-8100060 [3] N-8100063 [4] N-8100079</p>						

<b>4</b>	<i>Natural Resources Worldwide LLC v. U.S. Department of the Interior et al</i> , Docket No. 2:25-cv-00111, E.D. La., Complaint, Cover Sheet, Exhibits, and Summonses [R. Doc. 1]						
<b>5</b>	[In Globo] Closing Documents - Acquisition of Array Petroleum, LLC						
<b>6</b>	E-mail from Edward B. Poitevent, II to Ryan Lamb regarding NRW Installment Agreement dated June 14, 2024						
<b>7</b>	E-mail between Steve Dudgeon and Ryan Lamb regarding NRW Update and NRW Settlement Amount Explanation 10.2.2024 dated October 2, 2024						
<b>8</b>	E-mail between Ryan Lamb and Steven Dudgeon regarding NRW Update and (DOJ) NRW Outstanding Liabilities 10-09-2024 dated October 10, 2024						
<b>9</b>	E-mail between Steve Dudgeon and Ryan Lamb regarding NRW Update and NRW Reversals and Rebooks 10.10.24 dated October 10, 2024						
<b>10</b>	E-mail between Ryan Lamb and Steven Dudgeon regarding NRW Update and Cox Bankruptcy Lease Amount Owed dated October 29, 2024						
<b>11</b>	E-mail between Steve Dudgeon and Ryan Lamb regarding NRW Update dated October 29, 2024						
<b>12</b>	Offshore Contract Operating Agreement between Natural Resources Worldwide LLC and Array Petroleum, LLC effective February 1, 2024						
<b>13</b>	Array Petroleum – AFE TRACKER December 2024						
<b>14</b>	Correspondence - Audit of the Books and Records of Array Petroleum dated November 12, 2024						

<b>15</b>	E-mails between Ken Jackson and Jeff Chiasson regarding Monthly OI Totals from November of 2024						
<b>16</b>	E-mail between Ken Jackson and Rec Chaddock regarding October Model dated October 18, 2024						
<b>17</b>	E-mail between Ken Jackson and Rec Chaddock regarding Open Invoice LOE + AFE dated November 5, 2024						
<b>18</b>	E-mail between Ken Jackson and Rec Chaddock regarding Hurricane Francine AFE from October 25, 2024						
<b>19</b>	[In Globo] Pay.Gov ONRR Royalty and Invoice Payments from May of 2024 through December of 2024						
<b>20</b>	NRW reserves the right to offer any exhibit listed by any other party						

Dated: January 27, 2025

**STONE PIGMAN WALTHER WITTMANN L.L.C.**

/s/ Andrew D. Mendez

Andrew D. Mendez (Texas Bar No. 00797066)  
 Bryant S. York (Texas Bar No. 24084866)  
 Paul J. Masinter, *Pro Hac Vice* (La. Bar No. 18324)  
 909 Poydras Street, Suite 3150  
 New Orleans, Louisiana 70112  
 Telephone: (504) 581-3200  
 Facsimile: (504) 581-3361  
 Email: [amendez@stonepigman.com](mailto:amendez@stonepigman.com)  
[byork@stonepigman.com](mailto:byork@stonepigman.com)  
[pmasinter@stonepigman.com](mailto:pmasinter@stonepigman.com)

*Attorneys for Natural Resources Worldwide LLC*

**CERTIFICATE OF SERVICE**

I certify that on January 27, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Andrew D. Mendez